

# Upper Briggs Response to Comments

# INTRODUCTION

The following information details the Forest Service responses to public comments received on the Upper Briggs Landscape Restoration Environmental Assessment (EA) (Upper Briggs project). The Upper Briggs EA was posted for review in June 2018. An invitation to comment on the EA was mailed to individuals and organizations. A legal notice of the 30-day comment period was published in the Grants Pass Daily Courier on 2 May 2018. Written comments were received from 16 commenters. A complete copy of each letter received is available in the project record, hereby incorporated by reference. Comments received after 31 May 2018 were accepted and considered during the comment analysis period.

**Table 1. Commenters on the Kimball Thin Project Environmental Assessment**

| Date Received | Commenter                | Organization                                    | Commenter Code |
|---------------|--------------------------|---|----------------|
| 8-May-18      | Duward Brown             | No Known Affiliation                            | --             |
| 29-May-18     | Rachel Winters           | No Known Affiliation                            | --             |
| 29-May-18     | Ozzie Cummins            | No Known Affiliation                            | Cummins        |
| 30-May-18     | Jane Fossen              | No Known Affiliation                            | --             |
| 30-May-18     | Luke Ruediger            | Klamath Forest Alliance                         | LR             |
| 30-May-18     | Andy Geissler            | American Forest Resources Council               | AFRC           |
| 30-May-18     | Reed Wilson              | Benton Forest Coalition                         | WILSON         |
| 30-May-18     | Suzie Savoy              | Siskiyou Chapter Native Plant Society of Oregon | SCNO           |
| 30-May-18     | Howard Erbe              | Member of KSWild                                | ERBE           |
| 31-May-18     | Rich Nawa                | KSWild  | KSW            |
| 31-May-18     | Venus Killen             | NEST Cascadia                                   | NEST           |
| 31-May-18     | Mark and Christie Nelson | No Known Affiliation                            | --             |
| 31-May-18     | Christie Dunn            | No Known Affiliation                            | --             |
| 1-Jun-18      | Barbara Ullian           | Friends of the Kalmiopsis                       | FOTK           |
| 1-Jun-18      | Eileen Cooper            | Friends of Del Norte                            | FODN           |
| 1-Jun-18      | Gabriel Scott            | Cascadia Wildlands                              | CW             |

## Methodology

Each comment letter was read and coded based on content. At the Forest's discretion, comments were reviewed and sorted into two types – those that met the definition under 36 CFR 218.2 as “*specific written comments*,” and those that did not. Specific written comments are considered as: within the scope of the proposed action, have a direct relationship to the proposed action, and must include supporting reasons for the responsible official to consider.

Specific written comments are further defined below. These types of comments were identified and are responded to in this document.

- Identifies an issue not previously described or expands upon an existing issue in a new or important way;
- Provides information which reveals an inconsistency or omission in the analysis pertaining to existing environmental conditions, design of the proposed action, design of an alternative, or the consequences presented in the environmental document;
- Identifies or recommends a specific method, procedure, system, manipulation, allowance or constraint to modify or add to potential variation in, or a differing approach to, the proposed action that portrays an opportunity to change the magnitude, duration or significance of disclosed environmental consequences;
- Poses a question or explicitly/implicitly identifies information that could improve understanding

of the design of the proposal, the affected environment or anticipated impacts; or

- Offers a science study/citation that was not included in the Forest Service analysis or that suggests another perspective (i.e., that provides a differing or opposing viewpoint) to support a contention that environmental impacts described are incomplete, incorrect or do not adequately reflect scientific uncertainty or disagreement.

Possible responses are to:

- 1) Modify alternatives including the proposed action,
- 2) Develop and evaluate alternatives not previously given serious consideration by the agency,
- 3) Supplement, improve, or modify its analyses,
- 4) Make factual corrections,
- 5) Explain why comments do not warrant further agency response.

Comments that were identified as not meeting the above definitions for specific written comments are defined below. These comments are not responded to in this document.

- Express values, opinions, beliefs or assertions, and/or convey support, agreement or a preference (vote) for a particular action, alternative or outcome, that declares the respondent's perspective but does not dispute the results of the environmental review or explain the relevance of the statement to the proposed project design and acknowledged impacts [Note: While expressions of viewpoint are legitimate feedback for the Forest Service to consider and it is important to understand varied perspectives, an agency response is not ordinarily warranted for these types of statements.];
- Recite existing laws, regulations, management direction, policy, resource management knowledge, science literature conclusions/citations, definitions, practices or policies (or provide a personal interpretation of such) or restate analysis or information already documented in the environmental document;
- Provide commentary that is outside the scope of the proposal at hand (for example, implementation of the requested action would not comply with current law/policy or the relevance of a statement is not made clear with regard to the proposal, the suggested adjustment is outside of the responsible official's decision space or the commentary is not related to the proposal or its purpose and need under consideration); or
- Lacks site specificity to identify an effects analysis deficiency, lack clarity to understand the meaning of the respondent's statement in connection with the proposal at hand, or the comment is composed of expansive or vague assertions unsupported by data, logical line of reasoning, observation, evidence or specific relationship to the proposal under consideration.

## **Comments**

Upper Briggs EA comment letters containing specific written comments are summarized below **in bold** and are followed by the Forest Service response. Specific comments addressing essentially the same topic or concern have been grouped together. Each comment references the comment letter and relevant page number.

## ***Alternatives Development***

**Comment: The commenter requested during scoping an alternative that thins these stands heavier than what was proposed in the EA. This commenter states that a heavier thin would place the stands on an appropriate trajectory to a late-seral ridgetop condition. This commenter wants clarification on why the request was deferred. (Andy Geissler, AFRC, page 4)**

Response: The purpose of the proposed action is to enhance and maintain ecological function, processes and resilience, and to develop late-seral characteristic stands within the lower Rogue River watershed. To meet this purpose, the Forest Service proposed variable density thinning within identified dense stands in the project area. The silviculturist identified the appropriate level of treatment in stands within the project area, in collaboration with other specialists, taking into account other resource concerns and constraints.

### **Forest Management**

**Comment: The commenter questions the desire to manage the Matrix lands in this watershed based on an estimate from a 1993 USFS report, when the Watershed Analysis clearly states that “reconstruction of historic proportions of seral stages is speculative”. Please clarify how the stated Purpose & Need of the Upper Briggs project and the identified desired condition on page 14 of the EA is consistent with your LRMP. (Cascadia Wildlands)**

Response: The proposed action would comply with the Standards and Guidelines of the following allocation General Forest, Matrix 14 Timber to meet long-term Forest-wide timber production and harvest scheduling goals, the FORPLAN model selected a combination of timber management intensities for the Management Allocation. The Allocation was assigned three different harvest strategies, Intensive, moderate and extensive timber management. Objectives include: Provide multiple use development opportunities and a high yield of timber, subject to multiple use constraints. (Vegetation Analysis page 18)

**Comment: The commenter states the Oak Flat, Horse and Onion Mt fires were primarily low to moderate intensity ground fires. The BA p.74-76 (Table D-1. FVS results for No Treatment compared to Proposed Treatment) provides FVS modeling for reduced TPA 18-24” DBH and >24” DBH for each treatment type. Most treatments would reduce large trees >18” DBH by 30% or more. For example, strategic ridgeline FMZ would reduce large trees in dispersal habitat from 43 TPA to 21 TPA, a 49% reduction. Although the EA does not report retained TPA >20” DBH for each alternative, it can be inferred from Table 61 that a large proportion of large trees will be removed for DELSH and FMZ which is documented in the BA. (Cascadia Wildlands)**

Response: Some overstocked stands also contain larger trees that could benefit from a reduction of competing subordinates. In some cases, these subordinate trees are greater than 20” DBH due to high site productivity and are 80 years old or less. The condition to remove trees over 20 inches DBH would be to promote and cultivate a larger, adjacent (from within 10-15 feet) legacy tree. This treatment is designed primarily to retain large (>20 inch DBH) fire resilient trees (namely ponderosa pine, sugar pine, and Douglas-fir), reduce loss of species diversity, maintain vigor of the larger tree for optimum late-successional development, and modify the stocking level of the stand to reduce large-scale loss of existing late-successional structure. (Vegetation Analysis page 21)

**Comment: The descriptions of the alternatives fail to provide quantitative comparisons of baseline (no action) alternative TPA in each unit with TPA remaining in each unit and each alternative after logging. We recommend the following size classes: 7”-20” (small), 21”-31” (large) and >32” (very large). Estimates of trees per acre in relevant size classes is available through modeling from stand exams. (KS Wild)**

Response: The vegetation effects analysis contains the quantitative matrix used to determine the effects of logging proposed in the Upper Briggs Project EA (p. 249-250). There are no requirements for the Forest Service to disclose TPA per unit as it would not contribute further to the decision making process. The Forest Service has disclosed in the EA the relevant and applicable information for understanding the proposed forest management prescriptions at the stand scale. The Forest Service disclosed the information on the current stand condition, and explained how the proposed treatments would affect the stands relative

to the management direction set out in the NWFP and LRMP and the stated purpose and need of the project.

**Comment: The commenter states “Timber harvest shall not be programmed and should normally not occur” (SNF Plan IV-109 MA8-7). We object to timber harvest in MA8 because it is not necessary to achieve the goals of the management area. The EA fails to explain why it is not following the SNF Plan. (Cascadia Wildlands)**

Response: Timber harvest may be permitted in MA8-7, if it can be shown to be beneficial to specific endangered, threatened, or sensitive plant species and is shown by environmental analysis to best meet the goals of the management area." The one area mapped as MA-8 in the Upper Briggs watershed overlaps a portion of the Horse Creek Meadow Wildlife site (SNF Plan, maps on pages IV-104 and IV-112). The potential area of overlap between MA-8 and unit 48 is also riparian reserve and is included as LUA-RTV in the Briggs Creek RTV Plan. There is no intention to harvest timber in MA-8 in this project.

**Comment: Any large (>20”dbh or >100 years) tree selected for radial thinning should be either left alone or girdled (See SNF Plan). (Cascadia Wildlands)**

Response: See comment response in the DELSH section below regarding thinning stands  $\leq 100$  years.

**Comment: Action alternatives also increase risk for windthrow. We recommend that each unit be evaluated for windthrow and those at high risk be modified or dropped. For example, saddles on ridges funnel the wind and would cause units located at those locations to be at high risk of windthrow. We are very concerned that thinning tall skinny trees on ridges will lead to unacceptable windthrow that will cause the stand to fall below the 40% canopy and greatly increase fuel loading. (Cascadia Wildlands)**

Response: Due to the inability to accurately predict the potential for windthrow and because current stand conditions are not particularly conducive for substantial windthrow post-harvest, this issue was not analyzed in detail. However, silvicultural prescriptions that promote tree growth and resiliency to natural disturbances (including windthrow), coupled with current stand conditions would be sufficient to mitigate and neutralize windthrow potential.

**Comment: The revised EA must include stand age for each unit and the methodology for determining stand age as a stand alone appendix as required by NEPA. The methodology must have enough information such that stand age determinations could be repeated. For example, the methodology would include the technique used to determine the age of individual trees. Stand age is important for determining whether stands require red tree vole surveys and its response to thinning. Older stands >100 years are generally not recommended for thinning in the Siskiyou National Forest Plan. (KS Wild)**

Response See comment response in the DELSH section below regarding thinning stands  $\leq 100$  years. Stand age was determined through the use of the combination of the 1940 aerial photograph, managed stand Forest Activity layer for past management and sampling of tree cores following the FS Veg common stand exam methodology for determining tree age. FS Veg Common Stand Exam User Guide Chapter 4 Collecting and Recording Data, Tree age section page 204 " were used to determine stand age.

### ***Develop and Enhance Late Seral Habitat (DELSH)***

**Comment: The commenter states the DELSH units west of Meyers Creek are violations of the SNF Plan standard for restricting thinning to stands <100 years. Some of these units (e.g. units 2, 262, 9, 11, 8, 505, 12) are known to have old-growth clumps intermixed with 120 year old stands. Logging in these highly desirable uneven aged stands is extremely problematic because of existing structure (snags, legacy trees, down wood, etc.) and uncertainty of results (desired tree response may take 30**

**years or perhaps never). These stands are self-thinning and would improve over time with no management. Unlike plantations and the 1940 burned area east of ridge road 606, these older stands are on a trajectory to become quality spotted owls habitat and are likely used by owls for foraging. (Cascadia Wildlands)**

Response: The LRMP states "It is assumed that natural mortality will provide suitable snags during the last 30 to 35 years of a managed rotation (100 years)." Forest Wide Standards and Guidelines. MA 12-4 States "Commercial thinnings should normally occur between stand ages 40 and 100 years, with the objective of contributing substantial volume during the next 8 to 10 decades, or until around the year 2080." MA 13-4 states "Commercial thinnings should normally occur between stand ages 40 and 100 years, with the objective of contributing substantial volume during the next 8 to 10 decades, or until around the year 2080." DELSH Units 2, 262, 9, 11, 8, 505, 12 fall either under MA 13 or MA 12 allocations

### ***Fuels Treatments***

**Comment: The commenter supports underburning to meet written measurable vegetation and fuels objectives necessary for adaptive management requirements; however, prescribed fire must have specific vegetative objectives that can be monitored to assess effectiveness. This means that initial underburning need to have pre- and post-monitoring of vegetation and fuels with Firemon plots or some similar ecological technique. Qualitative monitoring by professionals is necessary but not sufficient. There needs to be objective species specific desired vegetative results established prior to burning. The commenter requests the decision must establish constraints on underburning when monitoring indicates that repeated underburning is not maintaining sensitive or desired plant species or underburning is having unanticipated adverse effects. The commenter states they would offer volunteers or staff to assist Forest Service staff with joint field monitoring. (Cascadia Wildlands)**

Response: Prescribed fire treatments are designed to apply low severity fire effects to reduce surface fuel loadings. It is recognized that many plant and tree species benefit from this type of fire. However, this is not the primary goal in the application of prescribed fire. It is expected that understory vegetation will benefit from prescribed fire and over-story thinning. A site specific burn plan will be created prior to implementation of burning, consultation with district Botany and Wildlife personnel will help to identify sensitive species present and type of desired fire effects and any potential mitigation measures required.

**Comment: The commenter requests that for species that need the natural disturbance of wildfire for their reproduction (i.e. *Sophora leachiana*), should be treated with prescribed fire in the fall, rather than with mechanical thinning. (Siskiyou Chapter, Native Plant Society of Oregon)**

Response: Prescribed fire treatments are designed to apply low severity fire effects to reduce surface fuel loadings and improve stand conditions to reduce wild fire effects. It is recognized that many species benefit from this type of fire. Mechanical treatment is not being used in lieu of fire, but as a tool to reduce overall stand density and surface fuel loadings. Reduced stand density will improve stand health and resilience. Coordination with the district Botanist during planning and implementation is ongoing, their input will be incorporated into site specific burn plan preparation and implementation. No plant species have been identified as being part of the purpose and need for project design and implementation.

**Comment: The commenter requests how fuels treatment projects can be cost effective in the Revised EA/Decision with limited budgets to treat these areas every 15 years. (Cascadia Wildlands)**

Response: This is outside the scope of the analysis. The Forest Service will prioritize treatment where they are most needed and will be most effective.

**Comment: The commenter requests a detailed, scientific data that demonstrates fuel reduction in this area will substantially reduce fire behavior or fire severity. (Siskiyou Chapter, Native Plant Society of Oregon)**

Response: Fuel models are used to help describe and quantify surface fuel situations and estimate fire behavior. Criteria for determining a fuel model involves assessing the fuel strata. Where fuel beds are fairly continuous with similar fuel characteristics, one model can provide a realistic representation of expected fire behavior.

The influences of fine fuels such as litter, duff, grasses and small woody fuels (less than 3 inches diameter) have the most effect on spread rate and intensity of fires. These fuels are used in fire behavior models developed for predicting the fire behavior and rate of spread of the initiating fire (Rothermel 1983). Coarse Woody Debris (>3 inches) have little influence on spread and intensity of the initiating fire; however, they can contribute to development of large fires and high fire severity. Fire persistence, resistance-to-control, and burnout time (affects to fire fighter and public safety, soil heating and tree mortality) are significantly influenced by loading, size, and decay state of large woody fuel.

As stated in the EA, p. 92, the fuel loading is estimated to be between 5 to 8 tons an acre in areas after treatment so they can be directly attacked with suppression resources increasing the chance of suppressing these fires in the initial attack phase while maintaining resource needs (Brown et al. 2003). Fuel treatments in these stands which include harvest would result in fuel characteristics reflective of Condition Class 1 (low vegetation department from natural conditions). Prescribed fire would be used to maintain Condition Class 1 to reduce the likelihood of damage to adjacent stands. Without treatment over time, stand types would shift toward fuel model TU5 (timber shrub-high load, with a high probability of fire to escape initial attack) as described **Error! Reference source not found. in Error! Reference source not found..** Trees would age, die, and fall becoming down woody material would exceed 10 tons per acre.

**Comment: The commenter states the 2008 Horse Mountain Fire, 2010 Oak Flat Fire and 2014 Onion Mountain Fires burned at mixed severity in the Briggs Creek Watershed. These fires included large areas of low severity, understory fire despite often heavy fuel loading. The EA fails to acknowledge the recent fire history and the potential for positive fire effects in future wildfires. (Luke Ruediger)**

Response: It is accepted that recent fires have had positive effects. Ambient conditions as well as surface fuel loadings influence overall fire severity and effects. Most fires are suppressed during initial attack. Those fires that escape usually do so during warm and dry weather conditions resulting in higher severity fire effects. High severity fire is not considered outside of the natural range of variability, however the Briggs valley project purpose and need is to maintain forest structure and composition that resulted from low severity fire specifically for Oak, Pine and meadow habitats. Activities identified in the proposed action aim to reduce stand densities and restore low severity fire effects to these habitats (EA, pages 2 and 10). Forest service records indicate that the planning area has had 91 fires since 1972. Most of these fires were suppressed during initial attack and held to less than 0.25 acres. One fire reached 25 acres, the total acreage burned within the planning area since 1972 is 58 acres.

The purpose and need statements of the EA (pages 2, 10) acknowledge the positive effects of wildfire. Maintain and restore structural and vegetation diversity (species composition and successional stages) as appropriate to abiotic and biotic site characteristics in upland areas (prolonging the persistence of legacy trees, accelerating development of later seral forest structure; restoring pine/oak, meadow habitats and rare plant populations). Associated with structural and vegetation diversity is the appropriate disturbance regime. Pine and Oak as well as other early seral species require lower stand densities and periodic low severity surface fire to maintain these forested settings. Current fire management is successful in

suppressing 97-98% of fires during initial attack. These 2-3% of fires that are not suppressed early, usually occur during the hottest and driest times of the summer. With current fuel and stand conditions burning during these hot and dry conditions, these pine and oak sites are at risk of uncharacteristic fire. After treatment, these stands will be more fire tolerant and resilient to future wildfire events. With reduced surface fuel loads, future fire behavior and effects will be of low severity.

**Comment: The majority of the planning area (64%) is claimed to be in Fire Regime 1 and associated with high frequency, low severity fire, but the agency again provides no citations or data to support these claims. (Luke Ruediger)**

Response: Landfire data and Forest Service GIS data identify Briggs valley as a fire regime 1, as well as historical fire records within the planning area. Fire Regime 1 is classified as having frequent low intensity surface fires are the norm (Agee 1993) (EA, page 86-87). Forest service records indicate that the planning area has had 91 fires since 1972. Most of these fires were suppressed during initial attack and held to less than 0.25 acres. One fire reached 25 acres, the total acreage burned within the planning area since 1972 is 58 acres.

Metlen et al, 2018 in press found that within the planning area boundary and adjacent sites North in the Taylor Creek drainage. The Secret Creek site had 13 intervals for the fire record 1768-1997. The last fire occurred in 1906, the median historical fire return interval was 6 years with a range of 3-26 years. To the North of Briggs at the Taylor Creek site, for the period 1795-2004 the median return interval was found to be 9 years with a range of 4-19 years. These data would put the Briggs area within a fire regime 1, or less than a 35 year fire return interval.

### ***Road Construction***

**Comment: The commenter objects to new road template construction >600 ft for any one road segment (whether temporary or permanent) and within riparian reserves. (Cascadia Wildlands)**

Response: There is no new road construction proposed in this project. (EA pg 128)

### ***Road Decommissioning***

**Comment: The commenter suggests the revised EA should consider storage or decommissioning of the following roads (2509025, 2509022k, 139, 660, 141, 040, 646, 627, 129, 127, 645, 637) due to watershed impacts, POC disease spread, and risk for fire ignitions. (Cascadia Wildlands)**

Response: The IDT completed a project level roads analysis, informed by the Rogue River-Siskiyou National Forest Forest-Wide Travel Analysis Report (Subpart A) map of roads likely not needed for future use, the 1997 Briggs Creek Watershed Analysis, and resource specialist knowledge of the road system within the planning area, including roads with known issues and/or needed or not for current and future access. This information is located in Attachment C Road Actions for Analysis within the Economics report and project record, and in the FINALRoadsREview12152017.xlsx file in the project record, IDT Roads Analysis folder.

### ***Effectiveness of Project Design Features***

**Comment: The comment requests the project install rolling dips, built with hardened filter fabric by use of a hand instrument. "Water bars are ineffective." (Ozzie Cummins)**

Response: Project Design Features have been proven to be effective in meeting the Clean Water Act. Kattelmann, 1996 reviewed of forest management impacts on water quality and concluded that the use of BMPs in forest operations was generally effective in avoiding significant water quality problems; the report noted that proper implementation of BMPs was essential to minimizing non-point source pollution.



BMPs would be monitored and, where necessary, modified to ensure compliance with Oregon Water Quality Standards.

### ***Riparian Reserves: Thinning***

**Comment:** The commenter objects to removal of Riparian Reserve trees >20" DBH or post-harvest riparian reserve tree densities <90 TPA. The commenter disagrees that thinning trees in the Riparian Reserves would cause remaining trees to grow faster and produce larger snags and down wood (Spies et al. 2013) unless it's in young plantations. The commenter requests trees >20" DBH be retained as standing live, standing dead or down wood because these large trees are ecologically important for riparian reserve function. Thinning must be guided by recommendations in Spies et al. 2013 (new information and best available science). Then Regional Forester Jim Pena signed off on Spies et al. 2013 as best available science. (Cascadia Wildlands)

**Response:** The Spies et al. 2013 was based on the Northeastern Oregon Variant and are not applicable to this local area. The local Inland California Southern Cascades variant was used to model the Upper Briggs vegetation effects to the alternatives. In Briggs, in riparian reserves, only stands less than 80 years old will be thinning. These are generally plantations.

### ***Riparian Reserves: Skips and Gaps***

**Comment:** The commenter recommends the revised EA propose some 20-60 ft diameter gaps adjacent fish streams to stimulate primary production where shade is limiting primary production. Research supports this management action as long as its small scale. Trees removed could be placed in the stream for large wood. Too much shade can be limiting factor just as not enough shade. (Cascadia Wildlands)

**Response:** The limitations on primary production in small streams is frequently due to reforestation practices that have reduced the amount of hardwoods directly adjacent to streams, not too much shade. Hardwoods provide benefits to stream productivity from external inputs of leaf biomass.

### ***Riparian Reserves: Wood Recruitment***

**Comment:** The commenter submitted the Interagency Science Team's (IST), "Effects of Riparian Thinning on Wood recruitment: A Scientific Synthesis (Spies et al. 2013). The commenter states the following (Cascadia Wildlands):

- The EA failed to disclose significant and long-term adverse effects from the Proposed Action thinning to 40% canopy to within 25 ft of intermittent streams and 60% canopy to within 85 ft of fish streams.
- The EA failed to make a scientifically valid comparison between No Action and Proposed Action riparian thinning with respect to the density of future dead trees and recruitment of dead wood to streams.
- The EA failed to describe specific unit by unit conditions that would warrant riparian reserve commercial thinning.
- The EA failed to provide any scientific data, reports, or published information to support assertions that habitat for wildlife and stream health would be improved and not be degraded from proposed riparian reserve thinning to within 25 ft of intermittent streams and 85 ft from fish streams.

**Response:** The effects of the Proposed Action, Alternative 3, and the No Action Alternatives are analyzed in the hydrology specialist report on pages 36-41 and 48-52 The Forest Service's Forest Biometrician and

FVS specialist Erin Smith-Mateja reviewed the Spies et al 2013 paper and addressed the Spies modelling methodology.

### **Meadows**

**Comment: The commenter objects to any proposed logging unit within the 200 ft meadow buffer, whether existing or restored due to buffer distances identified in the SNF Plan. Meadows must have a 200 ft no commercial cut buffer and emphasize decadence creation within the meadow. The EA must identify the 200 ft meadow buffer for all action alternatives and be incorporated into any timber sales. (Cascadia Wildlands)**

Response: LRMP states "Some timber may be harvested (unprogrammed) from buffer areas, but only as a management tool in reaching wildlife objectives."

SNF Plan p. IV-115: "All meadows should be managed as natural openings. All inventoried meadows and meadow edges should be maintained at existing size levels and, where opportunities exist, past encroachment by surrounding forest should be reversed. The following activities are important in maintaining optimum meadow habitat for wildlife:

1. Encroaching trees from surrounding forest and other undesirable vegetation should be removed from meadows.
2. Large, live trees within meadow areas may be left as is or girdled, depending on individual circumstances. Dead trees (standing or dead) should not be removed.
3. Meadow areas lost to encroachment may be restored to their former size. The Forests oldest aerial photographs (circa 1940) should be used as reference points in reestablishing the historical boundaries"

Furthermore, the SNF Plan p. IV-117 states:

1. The meadow edge vegetation (within 50 feet of the meadow edge) should generally not be disturbed (vertical habitat diversity is greatest here). Vegetation in the meadow edge may be manipulated, if beneficial to wildlife, For example, when manipulation of vegetation would help restore meadow areas already lost to encroachment; trees which must be killed should be girdled and left standing unless realization of meadow management objectives would be hampered. In reclaimed portions of meadows, a new buffer zone will be established.
2. Ground cover, shrubs and understory trees should be encouraged in a band from 50 to 200 feet away (average) from the meadow edges. If trees need to be killed in this zone, they shall not be removed (harvested) unless necessary to meet meadow management objectives. Habitat capability for cavity-using wildlife should never be less than the 100 percent level. As a general guideline until comprehensive management plans are developed for each District's special wildlife and botanical sites, unprogrammed timber harvest activities should take place in no more than one-third of this buffer area in a 20-year period (one half if the meadow is less than 10 acres).

The Forest would implement these standards and guidelines for the meadow restoration units. In additions, portions of the meadow restoration units are also within riparian reserve identified as LUA-RTV in the RTV Plan and would comply with those management requirements as well.

**Comment: The commenter states although removal of encroaching conifers is allowed in meadow habitat within the MA-8 designation, "large, live trees within meadow areas may be left as is or girdled, depending on individual circumstances. Dead trees (standing or down) should not be removed." (SNF Plan p. IV-115-119). The proposed logging prescriptions in the Meadow**

**Restoration, DELSH, Pine-Oak and Riparian Treatments proposed in the Upper Briggs Project violate Standards & Guidelines. (Siskiyou Chapter, Native Plant Society of Oregon)**

Response: See LRMP table in EA Page 10. Each proposed action is consistent with the LRMP as modified by the NWFP and NSO Recovery Plan. The portion of MA-8 that overlaps the Horse Creek Meadow wildlife site would be managed consistent with the Forest Plan and the RTV Plan.

**Comment: The commenter requests that meadow treatments include targeted non-commercial thinning along the meadow margin, prescribed fire, noxious weed removal, native plant restoration and planting of locally sourced native pollinator plants.**

Response: These recommendations are a part of the proposed actions for meadow restoration treatments in the EA (p. 18).

**Comment: The commenter states aerial imagery from 1940 was used as a "reference ecosystem" despite eighty years of mining, logging, ranching and boom towns in Briggs Creek watershed. Post settlement era aerial photographs are being used to define the extent of meadow habitats and have proposed to recreate them with "meadow restoration" treatments. (Howard Erbe)**

Response: The LRMP states under MA 9-7, "The Forest's oldest aerial photographs (circa 1940) should be used as reference points in re-establishing the historical boundaries." The LRMP uses 1940 as the reference point for analysis.

***Insects and Disease***

**Comment: The commenter states the issue of beetle mortality in previously thinned stands and the impact of beetle mortality forest wide was not adequately considered or analyzed in the EA. (Luke Ruediger)**

Response: The analysis is focused in the Upper Briggs watershed and does not address beetle mortality at the scale of the forest level. The analysis does have Aerial Detection Surveys.

**Comment: The commenter requests that long-term effects from commercial fuel reduction must be taken into account, with projections or adverse impacts from increases in bark beetles from logging proposed in the Upper Briggs project. <http://thesiskiyoucrest.blogspot.com/2017/11/bark-beetles-timber-blm-in-applegate.html> (Siskiyou Chapter Native Plant Society of Oregon )**

Response: The Environmental Analysis used 40 years of vegetation modeling (FVS) to assess vegetation impacts per alternative. Page 10 of the Veg analysis report.

**Comment: The commenter states the EA has not demonstrated that the western pine beetle or *Ips pini* is a threat to species diversity and does not believe there is sufficient actual monitoring data to warrant treatment. In addition, minor insect related mortality of pines would benefit animal diversity by providing snag habitat (e.g., bats). We recommend that thinning to protect species diversity from disease and insects be directed at forest stands that have developed since the 1940 fire and in plantations. (Cascadia Wildlands)**

Response: A Southern Oregon Forest Insect and Disease Service Center conducted a service trip to the Briggs valley area on May 5, 2014 and found flatheaded fir borer *Phaenops drummondi*, *Armillaria ostoyae*, *Phellinus weirii* and evidence of past *Dendrotonus brevicornis* activity in the area. Recommendations from the group pointed to stands that they visited were "based on basal area per acre, are greater than those where competition-mediated mortality is expected to begin." Their recommendations are that "the basal area threshold for elevated risk of pine bark beetle infestation in southwest Oregon on a highly productive site is 120 to 150 Ft<sup>2</sup>/ac". (Veg Analysis page 10)

### **Red Tree Voles (RTVs)**

**Comment:** The commenter states it appears that the District did not consider the 2012 Survey Protocol for the RTV. This document, which was adopted by the USFS and BLM in 2012, provides a protocol for determining what forest stands require pre-disturbance surveys for the RTV to comply with the Survey & Manage requirements. This protocol requires the action agency to collect stand-specific data including quadratic mean diameter (QMD), canopy closure, and general stand characteristics to determine whether stands meet the protocol requirements and thus warrant pre-disturbance surveys. The “Pechman exemption”, on the other hand, is a court-ordered exemption that should be applied separately from the 2012 protocol direction. Just because a stand does not meet this exemption does not mean it warrants pre-disturbance surveys. The “Pechman exemption” and the survey protocol should be viewed independently. We would like an explanation as to why the Wild Rivers District ignored the survey protocol for pre-disturbance surveys for the RTV and only considered the exemption. (KS Wild)

Protocol surveys were conducted in 2009 and 2010 for a previous project planning effort in Briggs Valley. Those surveys were conducted in all units for that project with any commercial component, which included some stands younger than 80 years in age. That project evolved into this project which shares some of the same proposed treatment areas. Pre-disturbance surveys were not conducted for the Upper Briggs Restoration Project because the RTV high priority site conservation plan was developed for the watershed using the results of that previous survey plus additional sites from other surveys conducted in the watershed.

**Huff. 2016 has had no programmatic NEPA analysis at the Northwest Forest Plan scale to ensure that the purpose of the NWFP as amended (USDA and USDI 2001) would be fulfilled and provide for cooperating agency review and public review. (KS Wild)**

The RIEC memo transmits a scientifically sound process to develop a conservation plan for RTV at the 5th field watershed scale. The MR does not authorize any actions on the ground. The conservation plan that the biologist develops on the forest for a particular 5th field watershed or watersheds is what communicates the conservation strategy. It is the project NEPA document that will apply the conservation strategy and authorize the logging. The HPS MR are an expectation for Category C and D species. RTV proactive conservation is the goal of the HPS MR.

There is no assessment of cumulative effects since the HPS MR doesn't identify specific sites or areas that would no longer be managed. One can't look into the foreseeable future and make an assumption on if this document will be used by Forests, where it will be used, and what the exact outcome will be.

**The Draft RTV plan fails to provide context for implementation. (KS Wild)**

The context though is provided to some degree within the HPS MR, pages 4-11.

Given the focus on 5th field watersheds, the relevance of the previous utility of the non-HPS case-by-case determinations seems irrelevant. Instead, to use the HPS MR, one is looking at a specific 5th field watershed, providing a reasonable assurance of persistence within it, and interconnections to adjacent watersheds.

The only FS unit that has utilized the identification of non-high priority sites is the Umpqua NF and that is for the Quartz Integrated project and Calapooya Divide Integrated project (Cottage Grove RD) and Elk Creek project (Tiller RD).

Huff 2016 is the development of a high priority site conservation plan (proactive approach to species conservation) not the identification of non-high priority sites.

A 2012 memo transmitted the identification of non-high priority sites (reactive approach to species conservation). Two requests for non-high priority site designation have been made and completed and both are on the Umpqua NF (Cottage Grove RD and Tiller RD). The 2012 memo transmitted the identification of non-high priority sites.

**Huff. 2016 has not been revised for Forest Service use since the adoption of the BLM Southwest Oregon RMP in August 2016 which entirely eliminated all conservation requirements for the Red Tree Vole. (KS Wild)**

For S&M species, we are to provide for a reasonable assurance of species persistence. There is no language in the January 2001 S&M ROD that directs FS to "ensure" persistence.

There is still conservation value from BLM lands, even in the new plan.

That's because Huff provided a rule set to provide a well-distributed connected population of red tree voles within the watershed, looking at what areas were already being managed consistent with RTVs, where did we need sites outside of those areas to provide good distribution, and how can we connect them all up. With less federal land managed for RTV conservation, there would likely need to be more HPS sites identified than if there was more federal land managed for RTV.

**Huff 2016 does not provide for Forest Service districts to write a "Red Tree Vole Conservation Plan". Similarly there are no provisions to develop "Red Tree Vole Conservation Plans" in the NW Forest Plan or the 2001 amendment to the Survey and Manage standards and guidelines (USDA and USDI 2001). (KS Wild)**

The RTV conservation plan is synonymous with terminology used in the January 2001 S&M ROD. They are called "high priority site management recommendations". See Jan 2001 ROD, pages 10, 19 and 20 and specifically the second full paragraph on page 20.

**Huff 2016 does not recommend any long-term certainty for the protection of high priority sites from destructive logging. (KS Wild)**

The intent was that these plans would be in place into the foreseeable future (10-15 years). IF the Forest should revisit the plan, they would need to continue to apply the rule set. There are multiple ways to provide RTV conservation within a watershed, and new information may result in new approaches. (Similarly, new information like larger fires, may render a need to revisit the plan as well, and that new plan may end up being more restrictive based on the altered habitat).

An amendment is not required. The use of a HPS MR is within the S&Gs as analyzed in the November 2000 FSEIS.

**Huff 2016:14 recommends for the establishment of high-priority sites that do not contain known red tree vole nests. (KS Wild)**

The S&M objective is not to assure viability, but provide for a reasonable assurance of species persistence. The draft conservation plan provides sufficient rationale to document that the HPS identified with unknown occupancy have a high likelihood of occupancy, due to previous survey work in the area, and broad-scale analysis (Rosenberg).

**The EA fails to disclose the impact to each existing RTV High Priority Site from action alternatives implemented consistent with the Draft Red Tree Vole Conservation Plan. (KS Wild)**

There has been no designation of sites within this watershed as High-priority sites previously (so there are no "existing RTV HPS"). This draft conservation plan is the first attempt to identify HPS. The RO will maintain spatial maps of forests that utilized the RTV HPS MR and they are finalized in a NEPA decision. The very term "high-priority" implies that some of the sites are a high-priority to maintain, while others are not. Currently all sites are managed/maintained, but that does not make them all HPS.

**Similar to the deficiencies in the EA, the Draft RTV Plan fails to describe the fate of 120 existing high priority red tree vole nest sites that are not included in LUA-RTV or within proposed HPS. (KS Wild)**

"Viability" is applied at the forest scale not at the site scale. The RTV that are in logging units are not considered to be contributing to a reasonable assurance of species persistence.

**The Forest Service scoping letter dated May 19, 2016 failed to mention the intent to prepare a Draft Red Tree Vole Conservation Plan that would allow the logging of dozens of existing high-priority sites that currently requires ten acre no cut buffers during project layout. (KS Wild)**

The Draft RTV Plan was available on the project website, along with the Environmental Assessment.

**The EA fails to include Siskiyou National Forest Plan amendment(s) to codify the Draft RTV Conservation Plan Briggs Creek fifth Field Watershed. The non high priority designations for an estimated 120 RTV nests is a defacto plan amendment that separately require NEPA analysis. (KS Wild)**

We already managed known sites under Survey and Manage (which is itself a plan amendment). The Draft conservation plan is just identifying where those sites are within the landscape, and documenting those land-use allocations that are being managed consistent with red tree vole conservation. This is not above and beyond the S&M S&Gs associated with the NWFP/S&M amendments to the SNFP.

The RTV plan describes actions allowed within riparian reserves. The NWFP specifically addresses the role of riparian reserves as providing for multiple species, including the red tree vole. As mentioned in Huff, this excerpt from the NWFP makes clear that we can restrict actions for this species: 1 (USDA and USDI 1994a: B-13):...any analysis of Riparian Reserve widths must also consider the contribution of these reserves to other, including terrestrial, species. Watershed analysis should take into account all species that were intended to be benefited by the prescribed Riparian Reserve widths. Those species include fish, mollusks, amphibians, lichens, fungi, bryophytes, vascular plants, American marten, red tree voles, bats, marbled murrelets, and northern spotted owls.

LUA-RTV is not a land allocation, or a land allocation change. It merely describes lumping those allocations that are managed consistent with RTV. All areas identified as LUA-RTV, HPS and connectivity areas are managed consistent with RTV conservation, not just areas with active nests.

If no RTV HPS MR was applied, then known sites would receive a minimum of 10 acre buffers and managed consistent with RTV conservation

**The Draft Plan p. 7 states “Most early seral stands (<20 years old) within the LUA-RTV are a result of recent fires and are managed consistent with red tree vole conservation.” )KS Wild)**

Correct.

**The EA and the Draft Red Tree Vole Conservation Plan fail to indicate how the RTV Plan would meet the EA Purpose and Need items, especially since implementation with Alternative 2 would remove substantial RTV habitat adjacent RTV nest trees in numerous Alternative 2 units. (KS Wild)**

Implementation of the RTV Conservation Plan is not an action to meet the purpose and need of the Upper Briggs Restoration Project. It is a method of meeting the management recommendations for the Oregon red tree vole under the Northwest Forest Plan.

**The Draft Red Tree Vole Conservation Plan was developed with little or no documentation of field review of 1) land-use allocations managed consistent with red tree vole conservation, 2) high priority sites outside those areas, 3) connectivity areas within and between watersheds, and 4) non-high priority sites, including areas where pre-disturbance surveys and site management are no longer needed. (KS Wild)**

The lands set aside to be HPS may contain RTV, but are only required to contain suitable habitat for RTV life requisites. The same is true for LUA-RTV. The forest verified that through their GNN dataset and aerial imagery/interpretation and field verification that happened during site visits and wildlife surveys that have occurred over the last six years of project planning and evaluation.

**West of Meyers Creek there are many existing RTV nest sites in two clusters within highly resilient Douglas-fir stands on site 1 ground, however, many of these existing occupied RTV sites were not selected as HPS in the Draft RTV Plan. (KS Wild)**

HPS are not required to encompass all known RTV sites, but rather provide a distribution of suitable RTV habitat that will provide for a reasonable assurance of RTV persistence in the watershed. That particular area has 4 HPS covering a total of 118 acres and include 50 known sites. Twelve additional known sites are within LUA-RTV in this same area. Seventeen known sites are not within the HPS or LUA-RTV in this area and are within alternative 2 treatment units in NSO dispersal habitat. The intent of treatment in those areas is to increase development of late-successional (NRF) habitat or where treatments are proposed in NRF in this area, they would maintain at least 60 percent canopy cover which is still suitable RTV habitat. Project design criteria would require that the seventeen trees be retained with connective canopy to avoid isolating them. This would allow for meeting the purpose and need of the project while providing for a reasonable assurance of persistence of RTV in the fifth-field watershed.

**The Draft RTV Plan p.25 provides a coarse scale map of RTV HPS and LUA-RTV that does not illustrate known nest sites or the Upper Briggs logging units in relation to proposed HPS. Mapping is inadequate for NEPA analysis. (KS Wild)**

The RTV Plan is independent of the proposed action and will be implemented at the scale of the Briggs Creek 5<sup>th</sup> field watershed. The known sites have been added to the RTV Plan maps (Figures 6 and 7) and maps of the RTV Plan with the Briggs Alternatives have been added to the EA.

**The Wildlife Report dated January 2018 has no mention of the DRAFT Red Tree Vole Conservation Plan or any analysis that was used in the Draft RTV Plan. (KS Wild)**

The RTV Plan was mentioned on page 24 of the Wildlife Report and was available for the public to comment on, during the comment period, on the project website. It will be added as an appendix to the EA.

**There is no indication that the Draft Plan made adjustments to account for low frequency of RTV occurrence in the Briggs watershed. (KS Wild)**

Seventy-five percent of national forest lands in the Briggs watershed is included in Survey Areas or the RTV Plan (HPS, LUA-RTV, connectivity areas) that will be managed consistent with RTV conservation. The size and distribution of HPS and connectivity areas provide well-distributed habitat within the watershed per the ruleset in the HPS Management Recommendations (Huff 2016) for a reasonable assurance of species persistence in the watershed documented in the RTV Plan.

**The Draft Plan ignores the consequences of using a model that overestimates red tree vole habitat in the watershed. (KS Wild)**

The GNN suitable habitat mapping is mapping potential RTV habitat, not occupied RTV habitat and is an acceptable source of data used by professional biologists throughout Region 6 for habitat evaluation. The modeled habitat was not the only data source in developing the RTV Plan. One-meter resolution aerial imagery, and field visits were also used to verify suitable habitat. This is described in the RTV Plan V. *Conservation Plan: Approach* and in the EA Appendix A.

**The Draft RTV Plan (p. 7) states: “All HPS were evaluated for conflicts with other management objectives.” (KS Wild)**

This is true, the effect of management consistent with RTV conservation on land allocation objectives was considered in the delineation of HPS and connectivity areas. Therefore, some acres within land allocations having management objectives that don’t necessarily coincide with RTV conservation per the management recommendations will be constrained. This is summarized in the Wildlife Report and the EA Appendix.

**The Draft Red Tree Vole Conservation Plan did not provide details on red tree vole surveys and known sites within the fifth-field watershed; and failed to display the information in tabular and map form as recommended by Huff 2016. (KS Wild)**



The red tree vole surveys within the Briggs fifth-field watershed were described in the draft RTV Plan and are on pages 7 and 11 of the Final RTV Plan. Maps of the sites were provided to the commenter upon request during the comment period (documented in project record). The known RTV sites have been included in Figures 6 and 7 of the final RTV Plan.

**The EA and Draft Conservation Plan provide conflicting information about management of known red tree vole nests. (KS Wild)**

Please see the above response.

**The Draft RTV plan p.9 states that “Late-successional reserve and riparian reserves for large perennial streams are the only land allocations managed consistent with red tree vole conservation in the Briggs Creek watershed (Figure 2).” (KS Wild)**

That is true – standards and guidelines for management in these land allocations is consistent with RTV conservation. Smaller riparian reserves are not included in LUA-RTV because they are not considered to be large enough to support the full-life requirements of RTV.

**The estimated 63% reduction in number of occupied HPS in the Draft RTV Plan (p. 9; 191 sites reduced to 71 sites) would allow for logging within 300 ft of numerous known red tree vole nest sites that would significantly reduce red tree vole prey for NSO within critical NRF habitat. (KS Wild)**

The draft RTV plan is a conservation plan for RTV and is not in the context of its predators. The Project BA evaluated the effects of the proposed action on the northern spotted owl.

Known RTV nest trees are not synonymous with high priority sites (HPS). High priority sites did not exist in the watershed prior to the draft RTV Plan. Not all HPS contain known nest trees, but they are assumed to be occupied by RTV because they contain similar suitable habitat as those HPS with known sites. The Final RTV Plan includes 98 of 169 known RTV nests trees that were not burned and still considered as possibly extant (RTV Plan p 11). Seventy-one nest trees are not included in the RTV Plan. Many of these nest trees are in areas that would be treated to increase development of late successional habitat to benefit spotted owls and some are in areas where it is desirable to maintain pine-oak habitat within the watershed, which also benefits other prey species of northern spotted owls as well as numerous other species in the watershed. As mentioned previously, seventy-five percent of the national forest lands in the watershed will be managed consistent with RTV conservation, leaving twenty-five percent of the watershed available for habitat management for species that require other habitat types.

**Red Tree Vole Conservation Plan will impact viability of RTV nest sites and habitat. (Klamath Forest Alliance)**

The RTV Plan identifies connectivity between HPS with known and assumed nest sites, as well as land-use allocations to be managed consistent with red tree vole conservation.

The Final RTV conservation plan designates 764 acres as HPS in addition to those LUA that are managed consistent with RTV conservation plus connectivity areas. The total acres are 23,442 acres that contain 61 percent of the suitable RTV habitat on federal lands in the watershed. In addition, 13 percent of the suitable habitat in the watershed is still subject to pre-disturbance surveys and management of known

sites per the RTV management recommendations. This results in 74 percent of the available suitable habitat on federal lands in the 5th field watershed that would provide for a reasonable assurance of RTV persistence in the 5th field watershed (Final RTV Plan and EA Appendix A, Table 1)

It is not the intent of the RTV HPS MR or this RTV conservation plan to create isolate, island populations or high levels of habitat fragmentation. By following the rule set in the RTV HPS MR, this 5th field watershed has habitat and lands identified that are expected to provide for a reasonable assurance of RTV persistence.

**The proposed RTV Conservation Plan provides no assurance for long term protection of RTV nest sites and habitat. (Klamath Forest Alliance)**

While in the future it is true that HPS may move around on the landscape, the intent of the Plan is to provide for RTV management for the foreseeable future (10-15 years). If in the future the Plan is revisited, configuration of HPS, connectivity, and RTV-LUA will need to conform to the rule set.

**Many currently known RTV nest sites would lose significant protections. (Klamath Forest Alliance)**

While true, it is expected that red tree voles exist in a large portion of the areas identified as HPS, connectivity, and RTV-LUA.

**The RTV Conservation Plan provides no assurance that currently occupied sites will be buffered from damaging land management activities. (Klamath Forest Alliance)**

High-priority sites within the watershed were not previously identified until the Plan was developed; none of the sites proposed as HPS would be logged. Sites that would be logged are considered non-High Priority Sites, sites not needing to be retained in order to provide a reasonable assurance of species persistence.

Long-term viability cannot be assured. The Survey and Manage goal is based on the NFMA viability provision, but the objective of S&M is to provide for a reasonable assurance of species persistence.

**The RTV Habitat Conservation Plan was not adequately field checked for accuracy. (Klamath Forest Alliance)**

GNN mapping and aerial imagery are an acceptable method of determining red tree vole habitat, based on our knowledge and understanding of what that habitat is. GNN habitat mapping and aerial imagery are important tools used by wildlife professionals that provide finer-scale accuracy, useful for larger-scale assessments. Many of the sites and GNN habitat verification has occurred on the ground by the project biologist over the last six years of project site visits and surveys.

**Mapping in RTV Habitat Conservation Plan is inadequate. (Klamath Forest Alliance)**

Maps have been added to Appendix B of the EA.

**The RTV Habitat Conservation Plan will impact a preferred prey species of the ESA listed NSO. The RTV Conservation Plan was not discussed in the Upper Briggs Restoration Project: Wildlife Report & Biological Evaluation, dated January 2018. (Klamath Forest Alliance)**

It was mentioned on page 24 of the project Wildlife Report and Biological Evaluation. Effects to red tree voles was evaluated in the project BA for the northern spotted owl.

### ***Northern Spotted Owls***

**Comment: The commenter requests the Forest Service to implement policy of “no incidental take” of northern spotted owls to ensure coordinated federal management across its range. (Cascadia Wildlands)**

Response: The Rogue River-Siskiyou National Forest is under the management of the Northwest Forest Plan and is in compliance with Section 7 of the Endangered Species Act by completing consultation with the U.S. Fish and Wildlife Service (USFWS) on June 29, 2017. The USFWS concluded in its Biological Opinion (Tails# 01EOFW00-2017-F-0308) that the effects of the project were to not likely contribute to a trend towards federal listing or cause loss of viability to population or species. Furthermore, the effects are not expected to be persistent long-term negative impacts; as the treatments are designed as such that habitats will be more diverse and sustainable in the long-term (EA page 24). The action area is expected to continue to fulfill its role in the survival and recovery of the spotted owl at the provincial scale (BO, p. 61).

**Comment: The commenter states the EA and supporting document have conflicting information about fire being the greatest threat to spotted owls when it clearly is barred owl competition. (Cascadia Wildlands)**

Response: While it is true that the barred owl is a great threat to the northern spotted owl (BO, page 19), the greatest threat to the northern spotted owls habitat is high severity fire (BO page 20).

**Comment: The commenter states the revised EA/Decision must clearly explain the significant tradeoff of owl incidental take for fuel reductions involving commercial logging. Published research has shown this tradeoff is not valid at the landscape scale (Odion et al 2014). The commenter requests the Forest Service pursue mostly understory treatments in unburned areas by thinning from below and maintain canopy at 60% or greater in critical NRF habitat except for true pine sites (e.g. Jeffrey Pine series). (Cascadia Wildlands)**

Response: The project BO provides and explanation of the trade off of owl take and commercial thinning for fuel reduction (BO pp 33-42).

**Comment: The commenter states EA fails to consider Odion et al. (2014:37) which states “[e]ven if rates of fire increase substantially, the requirement that the long-term benefits of commercial thinning clearly outweigh adverse impacts is not attainable with commercial thinning in spotted owl habitat. It is also becoming increasingly recognized that exclusion of high-severity fire may not benefit spotted owls in areas where owls evolved with reoccurring fires in the landscape.” Spotted owls evolved with fire in the Klamath Region (see Clark et al. 2013). (Cascadia Wildlands)**

Response: From the project BO, page 20: Recent range-wide spotted owl habitat trends reported by Davis et al. (2016) illustrate variable rates of loss depending on land allocation, ownership, and Provincial location. Range-wide there was a gross loss of about 650,200 acres of nesting/roosting habitat on federal lands (Davis et al. 2016, Table 6), which represents about 7.2 percent of what was present in 1993. Habitat loss on federal lands from timber harvesting represents 25 percent of what was anticipated. Most of the overall losses (73 percent) occurred within the federally reserved land use allocations, or a loss of about 7.5 percent of the habitat reserved by the NWFP. The majority of these losses occurred in the California and Klamath Physiographic Provinces; these losses have largely resulted from the effects of high severity fires and correspond with areas intended for long-term conservation (reserves) (Davis et al.,

2011, p. iii; Davis et al. 2016, page 23, 35-38). These provinces have also been noted as a portion of the range important for spotted owl recovery and conservation; Schumaker et al. 2014, pp. 587-588).

### ***Fisher***

**Comment: The commenter requests the project area be systematically searched for fisher as recommended in SNF and that all suitable habitat be assumed occupied. (KS Wild)**

Response: All suitable habitats were considered to be occupied by Pacific fishers and were analyzed as occupied in the effects analysis (EA page 164).

### ***Beavers***

**Comment: The commenter states the one of best ways to meet the objectives of the purpose and need for this project is reintroduction, protection and establishment of thriving beaver populations in the Briggs Creek watershed (U.S. Forest Service's Briggs Creek Watershed Analysis). (Friends of the Kalmiopsis)**

Response: The purpose and need for the Upper Briggs project did not identify reintroduction of wildlife species for maintaining and restoring riparian reserve conditions (ACS objective 8). This request is outside the scope of this project. The results of introducing beavers to achieve site specific riparian objectives is highly speculative.

### ***Recreation***

**Comment: The commenter states there is an inconsistency between the Siskiyou National Forest Land and Resource Management Plan and Visual Quality Objectives (i.e. Partial Retention for vegetative screening along trails). (KS Wild)**

Response: The commenter suggests applying a variable width 25-50 ft no cut buffer. The commenter highlights the Siskiyou National Forest-Wide Standards and Guidelines for Dispersed Recreation to suggest that Alternative 2 does not achieve the Partial Retention VQO. However, commenter does not adequately refer to the specific management direction for Partial Retention Visual areas that are found in the Management Area Prescriptions.

Forest –Wide Standards and Guidelines are the overall direction for managing resources and activities on the Forest, while Management Area Prescriptions provide further management direction for specific areas of the Forest.

The following information utilized by the commenter is pulled from the Forest-Wide Standards and Guidelines which is the overall direction for management activities along trails regardless of the Management Area Prescription.

While the Forest-Wide Standards and Guidelines provide useful mitigation measures for activities along trails it does not specify where these mitigations measures are to be implemented. Management Area Prescriptions and the assigned VQO offer more specifics in regards to where mitigation measures would be implemented.

The VQO system uses scenic integrity, which includes the degree of deviation from the landscape character and intactness of the landscape character, for a frame of reference to measure achievement of visual quality objectives. Scenic integrity is essentially a continuum of how much a landscape has been altered beginning with a very high scenic integrity (unaltered) or preservation VQO to very low scenic integrity (heavily altered) or maximum modification VQO. A partial retention VQO is identified as a

moderate scenic integrity level (slightly altered) where management activities are expected and are sometimes evident to the average person, but they do not attract attention.

Vegetative screening (no cut buffers) are more applicable to a retention VQO where the scenic integrity is high and management activities are not visually evident to the average person unless they are pointed out. In locations designated partial retention VQO, management activities are expected and to eliminate visual impacts within the first year, appropriate mitigation measures are implemented. Mitigation measures include flush cutting stumps, slash removal and visually sensitive tree marking. With the mitigation measures, groundcover is expected to heal quickly and evidence of management activities will be minimal within a year or so of occurrence meeting the Partial Retention VQO.

### ***Port-Orford Cedar (POC) Root Disease or P. Lateralis***

**Comment: The commenter requests that no activities take place during wet weather, including the summer months to prevent the spread of P. lateralis. If summer rain is forecasted, all activity should be postponed until the weather dries out and the likelihood for P. lateralis spread has abated. Uninfected areas should not be treated with heavy machinery. Uninfected areas should be treated with prescribed fire to limit the potential for P. lateralis spread. (Siskiyou Chapter Native Plant Society of Oregon)**

Response: The Upper Briggs Project meets the requirements of the Record of Decision for Management of Port-Orford-cedar in Southwestern Oregon (USDA POC ROD) (EA, p. 247, 297) and Vegetation Specialist Report – Appendix A (p. 48).

A POC Risk Key was completed for the Upper Briggs Project which identified the project's risk of spreading POC (Veg Specialist Report, Appendix A) and the management strategies to reduce this risk are incorporated into the PDCs of the EA (p. 49-50). The requirements of the USDA POC ROD, do not require eradication of POC at any cost. If the risk cannot be reduced to the point it is no longer appreciable through practicable and cost-effective treatments or design changes, the project may proceed if the analysis supports a finding that the value or need for the proposed activity outweighs the additional risk to POC created by the project.

However, under Alternative 2 there would be a very low probability of additional risk of spread of P. lateralis (0 to 2 percent probability of occurring). Without mitigation, the relative probability would be very high (50.1 to 100 percent probability) for the proposed activities, so the proposed integrated management practices described below would be very effective at decreasing that risk (Veg Specialist Report, Appendix A).

Therefore, the commenter's requests are beyond the scope or requirements of the USDS POC ROD and would be impracticable, cost prohibitive, and unnecessarily restrictive to the project.

### ***Climate Change***

**Comment: The commenter requests more focus on carbon emissions from timber extraction than on the potential for wildfire in the EA analysis. The commenter requests the following information be considered: <https://www.hcn.org/articles/climate-change-timber-is-oregons-biggest-carbon-polluter> (Siskiyou Chapter Native Plant Society of Oregon)**

Response: The EA (p. 271) acknowledges the contributions of forestry on carbon emissions from the Intergovernmental Panel on Climate Change, which summarized the contributions to climate change of global human activity sectors in its Fifth Assessment Report (IPCC 2014). In 2010, anthropogenic (human-caused) contributors from forestry activities to greenhouse gas emissions was estimated at contributing 12% of the total anthropogenic contributors.

The main activity in this sector associated with GHG emissions is deforestation, which is defined as removal of all trees, most notably the conversion of forest and grassland into agricultural land or developed landscapes (IPCC 2000). Stands managed by the U.S. Forest Service are being retained and thinned to maintain a vigorous condition that supports trees, and sequesters carbon long-term.

### ***Monitoring***

**Comment: The commenter recommends the Decision identify specific required monitoring for project implementation and additional monitoring that is optional at the discretion of resource specialists. We would be willing to assist the Forest Service with monitoring pre- and post-logging canopy percent. (Cascadia Wildlands)**

Response: The Project Design Criteria/Mitigation Table (Chapter 2) outlines the monitoring needs for the Upper Briggs Project.